

REMARKS

Claims 1-20 are pending.

Independent Claims 1 and 10 have been amended to particularly point out and distinctly claim Applicants' invention. See, for example, Applicants' Specification at page 5, lines 16-19 and lines 22-26; and Figures 1-4, 6 and 7.

Claim 20 has been amended to address and overcome the Examiner's rejection under 35 U.S.C. 112, second paragraph with respect thereto.

Information Disclosure Statement

Applicants note with appreciation the Examiner's indication that Applicants' Information Disclosure Statement (IDS) submission is in compliance with the provisions of 37 CFR 1.97 and, therefore, has been considered by the Examiner.

Applicants also note with appreciation the Examiner's identification of an inadvertent typographical error in the IDS. As requested by the Examiner, Applicants submit herewith a corrected IDS, which is attached hereto as Appendix A.

Claim Objection

The Examiner objects to Claim 10, indicating that in Claim 10, line 15 ":" (i.e., a colon) should be changed to ";" (i.e., a semi-colon). Applicants agree that a semi-colon is the appropriate punctuation. However, it is respectfully submitted that line 15 of Claim 15, in fact, already has a semi-colon, and not a colon as thought by the Examiner. As such, no corrective action is believed to be required.

Claim 20: Rejected Under 35 U.S.C 112, ¶2

The Examiner rejects Claim 20 under 35 U.S.C. 112, second paragraph, stating that the term "cooperable" is not discussed earlier in the specification and, therefore, that there is insufficient antecedent basis for that term in the claim.

In the sole interest of expediting the prosecution of the instant Application toward the issuance of a Notice of Allowance, Applicants have amended Claim 20 to remove the objected-to term, "cooperable," and have replaced it with the recital, "structured to cooperate." It is respectfully submitted that the scope and meaning of amended Claim 20 and, in particular, the phrase "structured to cooperate" is clear and concise. Support for this amendment is also provided in Applicants'

Specification, for example, at page 3, lines 25-28, which disclose the attachment structures being disposed on the panel and being “structured to cooperate with the handheld electronic device to removably mount the compartment door... ” (emphasis added).

Accordingly, it is submitted that Claim 20, as amended, passes muster under section 112. Reconsideration and allowance are, therefore, respectfully requested.

Claims 1, 2, 4, 7-13 and 16-19: Rejected Under 35 U.S.C. 102(e)

The Examiner rejects Claims 1, 2, 4, 7-13 and 16-19 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,992,699 (Vance et al.)

Vance et al. which, at best, discloses an optical system disposed between front and back covers of the housing of an electrical device and including a first light aperture formed in a front cover of the housing and a second light aperture formed in the back cover of the housing (column 1, lines 49-52; Figures 2, 3, 8, 9 and 13 of Vance et al.), fails to disclose each and every element of Claim 1, as hereby amended and, therefore, does not anticipate that claim.

Specifically, independent Claim 1 has been amended to recite, *inter alia*, the exterior of the primary housing portion of the handheld electronic device including an exterior surface, wherein the **cavity is formed in the exterior surface**. The words highlighted in bold herein identify distinctions of the claimed invention over the cited references.

The Examiner argues that Vance et al. teaches a primary housing portion with a cavity formed therein. Specifically, the Examiner asserts that it is inherent that there will be a cavity in portion 42 (i.e., the housing cover) of the handheld electronic device 10 of Vance et al. However, such a cavity is formed on the interior of the cover 42 by way of the clam-shelled nature of the covers 42,44 of the housing 40.

Underlined words herein identify teachings of the cited reference(s) which are contrary to the claimed invention. Specifically, Vance et al. fails to disclose a **cavity being formed in an exterior surface** of a primary housing portion of a handheld electronic device, as claimed. Rather, at best, Vance et al. discloses a housing 40 having a front

cover 42 and a back cover 44 (column 3, lines 6-16; and Figures 2 and 3 of Vance et al.). The exterior surface (not labeled) of cover 44, or for that matter cover 42, does not include a cavity. At most, the back cover 44 contains a second light aperture 48 for the optical system 50 (column 3, lines 14-19) (a first light aperture 46 is disposed on the front cover 42, as shown in Figures 2, 10 and 12). The cavity argued by the Examiner to be inherent is, therefore, that which is formed by the interior surfaces of the front and back covers 42,44 when the covers 42,44 are clam-shelled together to form the housing 40. Accordingly, the circuit board 38 and optical system 50 of Vance et al., which are clam-shelled in the cavity between the front and back covers 42,44 of the housing 40 (column 3, lines 20-25), comprise an entirely different structure than that which is claimed.

Additionally, Vance et al. also fails to disclose a camera being **mounted to a panel of a removable compartment door** and, therefore, being removable along with the compartment door. For example, as shown in Figures 2-4 and disclosed at page 7, line 30 through page 8, line 2 of the instant Application, Applicants' camera 48 is mounted to the panel 40 of the compartment door 20 and, therefore, is removable from the handheld electronic device 4 along with the panel 40 on which it is mounted. The compartment door 20 can, therefore, be replaced with one which does not include a camera such as, for example, alternate compartment door 136, shown in Figure 5 (see also page 7, lines 24-29 of the Specification) of the instant Application.

Accordingly, as the Vance et al. reference fails to disclose all of the elements of amended Claim 1, the claim patentably distinguishes over the reference.

Claims 2, 4 and 7-9 depend, directly or indirectly from amended independent Claim 1 and, therefore, are also patentably distinguishable over the Vance et al. reference at least on the basis of such dependency.

Claim 2 further patentably distinguishes over the Vance et al. reference because that reference fails to disclose or suggest an outer surface of a compartment door panel being disposed substantially flush with an exterior surface of a primary housing portion adjacent a cavity, when the compartment door is mounted to a handheld electronic device. Rather, that reference, at best, teaches a circuit board 38 having a

bottom surface (not labeled) that, at best, abuts the inside surface of the back cover 44 of the housing 40. This view is confirmed with reference to Figure 3 of the Vance et al. reference, which clearly shows that there is no panel on the back cover 44, let alone one that has an outer surface that is substantially flush with the exterior surface of the back cover 44 adjacent a cavity in the exterior surface of the back cover. Figures 1 and 4 and the corresponding disclosure at page 6, lines 17-28 of the instant Application, on the other hand, disclose the outer surface 60 of the panel 40 being substantially flush with the exterior surface 28 of the primary housing portion 16, with the panel being recessed within ledge 86 of the primary housing portion 16.

With regard to Claim 7, contrary to the Examiner's assertions, Vance et al. fails to disclose a support disposed on an inner surface of a panel of a compartment door, as claimed. Rather, the optical assembly 50 of Figure 4 of Vance et al. is a subassembly that is mounted on a separate circuit board 38, wherein the subassembly is, at best, clam-shelled between the front and back covers 42,44 of the housing 40 of the electronic device (column 3, lines 20-25). Therefore, the camera is not removable with the compartment door of the electronic device as shown, for example, in Figures 2 and 3 of the instant Application. More specifically, item 67 to which the Examiner analogizes the claimed support of the panel of the compartment door is, in fact, "a spring clip 67 that engages a pair of flat surfaces 68 on shaft 62 of the mirror assembly 52" (emphasis added) (column 3, lines 42-47; and Figures 4 and 7 of Vance et al.). Such spring clip, which is disposed on the circuit board 38, fails to disclose or suggest a support on the inner surface **of the door compartment panel** for supporting the camera thereto such that the camera is removable with the compartment door.

Regarding Claim 9, Vance et al., at best, teaches a spring clip 67 disposed substantially at the end of a circuit board 38 (Figure 4; and column 3, lines 20-25 and lines 61-62). The circuit board 38 cannot properly be said to be an inner surface of a **panel of a compartment door**, as claimed. Rather, the circuit board 38 and optical system 50 are separate from the compartment door and are clam-shelled between the front and back covers 42,44 of the housing 40. As such, the "support" (i.e., spring clip 67) of Vance et al. supports the "camera" (i.e., optical system 50)

within the housing 40, between the covers 42,44 and not on a panel of a compartment door so as to be disposed within a cavity on the **exterior surface** of the primary housing portion, in order to be removable therefrom, as contemplated by the claimed invention.

Claim 10 is another independent claim, which has been amended in a manner similar to Claim 1, previously discussed. Specifically, Claim 10 has been amended to recite, *inter alia*, the exterior of the primary housing portion including an exterior surface, wherein the cavity is formed in the exterior surface. Accordingly, Claim 10, as amended, patentably distinguishes over Vance et al. for reasons similar to those discussed previously with respect to amended independent Claim 1. In particular, at best, Vance et al. discloses a housing 40 having a front cover 42 and a back cover 44 (column 3, lines 6-16; and Figures 2 and 3 of Vance et al.) with an optical system 50 being clam-shelled in the cavity formed between the front and back covers 42,44. Thus, the reference fails to disclose a **cavity being formed in an exterior surface** of a primary housing portion of a handheld electronic device, as claimed.

Claims 11-13 and 16-19 depend, directly or indirectly, from amended independent Claim 1 and, therefore, are also patentably distinguishable over the Vance et al. reference at least on the basis of such dependency.

Claim 11 is further patentably distinguishable over the Vance et al. reference for reasons similar to those previously discussed with respect to Claim 2.

Claim 12 is further patentably distinct over the Vance et al. reference because that reference fails to disclose or suggest a substantially unaltered overall form factor when a compartment door is mounted to a primary housing portion, as claimed. Rather, that reference, at best, teaches a back cover having an exterior surface that is devoid of a cavity and, thus, also devoid of a compartment door for such cavity (see, for example, Figure 3 of Vance et al.). This requires the entire back cover 44 to be removed in order to access the cavity at the interior of the housing 40 between the clam-shelled covers 42,44 thereof.

Claim 16 is further patentably distinguishable over the Vance et al. reference for reasons similar to those previously discussed with respect to Claim 7.

Claims 3 and 20: Rejected Under 35 U.S.C. 103(a)

The Examiner rejects Claims 3 and 20 under 35 U.S.C. 103(a) as being unpatentable over U. S. Patent No. 6,992,699 (Vance et al.) and further in view of U.S. Patent No. 6,660,427 (Hukill et al.).

Vance et al. has been discussed hereinabove. With regard to Claims 3 and 20, it is respectfully submitted that the Examiner has improperly analogized the ends of the circuit board 38 of Vance et al. to the ends of the claimed compartment door. As previously discussed, at best, the circuit board 38 of Vance et al. abuts the interior surface of the back cover 44 of the housing 40 of that reference. This is contrary to a compartment door being structured to cooperate with a handheld electronic device to enclose a cavity on the exterior surface of a primary housing portion (i.e., back cover) of the handheld electronic device, as claimed.

Hukill et al., at best, discloses a latching assembly for a battery door of a portable electronic device wherein the latching assembly includes an encapsulated biasing spring (Figures 1 and 9-12 of Hukill et al.). Accordingly, Hukill et al., which fails to disclose any camera, let alone a camera that is mounted on a removable compartment door panel, as claimed, adds nothing to Vance et al. to render Claims 1 and 10 unpatentable. As such, Claims 3 and 20, which depend from amended independent Claims 1 and 10, respectively, are also patentable at least on the basis of such dependency.

In view of the foregoing, it is respectfully submitted that Claims 3 and 20 are patentably distinguishable over the Vance et al. and Hukill et al. references, whether considered individually or in combination. Reconsideration and allowance are, therefore, requested.

Claims 5-6 and 14-15: Rejected Under 35 U.S.C. 103(a)

The Examiner rejects Claims 5-6 and 14-15 Under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,992,699 (Vance et al.) and further in view of U.S. Patent No. 6,616,277 (Davenport).

Amended independent Claims 1 and 10 are patentably distinguishable over Vance et al. for the reasons previously discussed hereinabove. Davenport, which is discloses a method and apparatus for detecting diseases and abnormalities of a patient's

eyes using a group of light-emitting diodes (LEDs), adds nothing to Vance et al. to render Claims 1 and 10 unpatentable. Accordingly, Claims 5-6 and 14-15, which depend, directly or indirectly, from amended independent Claims 1 and 10, respectively, are also patentable over the Vance et al. and Davenport references, whether considered individually or in combination, at least through such dependency.

Conclusion

The prior art made of record and not relied upon, but considered pertinent to Applicant's disclosure, has been reviewed and is deemed not to provide any additional relevant teaching. In summary, it is submitted that Claims 1-20 are patentable over the references of record.

Reconsideration and early allowance are requested.

Respectfully submitted,

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APPENDIX A